

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

YILI TSENG,) CIVIL DIVISION
Plaintiff,) Case No. 2:20-cv-1121
)
v.)
)
MADISON HARRIS, DOE 1, DOE 2, DOE 3,)
DOE 4, DOE 5, DOE 6, DOE 7, DOE 8, DOE 9,)
DOE 10, DOE 11, DOE 12, DOE 13, DOE 14,)
and DOE 15,)
)
Defendants,)

FILED
JUL 31 2020
CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

MOTION FOR ORDER TO REVEAL DEFENDANTS' IDENTITIES

1. Defendants, Madison Harris (“Harris”), Doe 1, Doe 2, Doe 3, Doe 4, Doe 5, Doe 6, Doe 7, Doe 8, Doe 9, Doe 10, Doe 11, Doe 12, Doe 13, and Doe 14, filed the defamatory joint complaint against Plaintiff with Michael Zieg (“Zieg”), then interim Dean of College of Health, Engineering, and Science (“CHES”), Slippery Rock University of Pennsylvania (“SRU”). Zieg officially notified Jerry Chmielewski (“Chmielewski”), then Interim Provost, SRU, Holly McCoy (“McCoy”), Assistant Vice President Diversity and Compliance, SRU, and Lynne Motyl, Chief Human Resources Officer, SRU, of the joint complaint. Nonetheless, Zieg held the names of all defendants from Plaintiff by sharing a copy of the redacted complaint (Exhibit 1). Plaintiff could only identify Harris through her threat in the past. Hence, Plaintiff moves this Court to grant an order to request SRU to provide Plaintiff an un-modified copy of the complaint and provide the home address of all Defendants listed in the joint complaint.

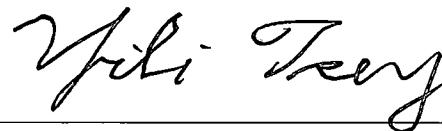
2. On or about November 15, 2019, Harris filed a complaint of gender discrimination on Assignment 1 with McCoy of the Office of Diversity and Equal Opportunities

(“ODEO”), SRU against Plaintiff. McCoy officially notified Chmielewski, Zieg, and Motyl of the complaint. After investigation, ODEO found no violation of discrimination policy and closed the discrimination complaint on May 6, 2020 (Exhibit 2). The discrimination charge is false and defamatory. In the intake form, Harris indicated that there was a witness (Question 7, Exhibit 3). However, the name of the witness was redacted. Since the witness is a conspirator of defamation, Plaintiff moves this Court to grant an order to request SRU to release the name of the witness to Plaintiff.

3. On or about March 31, 2020, after SRU ordered to change all its face-to face courses to online courses because of COVID-19, Doe 15 sent an e-mail to William Behr, President of SRU, to show his concern about the change (Exhibit 4). In his e-mail, Doe 15 mentioned that two other faculty members took the same teaching methods adopted by Plaintiff for online courses. But Doe 15 singled out Plaintiff by pointing out his name and claimed “I feel like the quality of the teaching presented is seriously declining with no recourse.” without providing any tangible evidence. This e-mail was forwarded to Zieg. In turn, Zieg cut and pasted body of the e-mail in his e-mail to notify Plaintiff while carbon-copying Sam Thangiah, Chairman of Computer Science Department, SRU and direct supervisor of Plaintiff. Doe 15’s action is defamatory. Plaintiff moves this Court to grant an order to request SRU to reveal the name and home address of Doe 15 to Plaintiff.

Dated: July 29, 2020

Respectfully submitted,

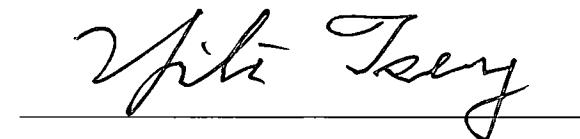


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Pro Se

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this 29th day of July, 2020, I have served the foregoing MOTION FOR ORDER TO REVEAL DEFENDANTS' IDENTITIES by USPS 1st class mail on the following:

Madison Harris
1479 State Route 168
Georgetown, PA 15043



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